

1 EDMUND G. BROWN JR., Attorney General  
of the State of California  
2 ARTHUR D. TAGGART  
Supervising Deputy Attorney General  
3 JANA L. TUTON, State Bar No. 78206  
Deputy Attorney General  
4 California Department of Justice  
1300 I Street, Suite 125  
5 P.O. Box 944255  
Sacramento, CA 94244-2550  
6 Telephone: (916) 324-5342  
Facsimile: (916) 327-8643

7 Attorneys for Complainant  
8

9 **BEFORE THE**  
10 **BOARD OF PHARMACY**  
11 **DEPARTMENT OF CONSUMER AFFAIRS**  
**STATE OF CALIFORNIA**

12 In the Matter of the Accusation Against:

13 ROXANA M. JOHNSON  
14 P.O. Box 575  
Citrus Heights, CA 95621

15 and

16 7916 Arcade Lake Lane  
17 Citrus Heights, CA 95621

Respondent.

Case No. 2990

**DEFAULT DECISION  
AND ORDER**

[Gov. Code, §11520]

18  
19 **FINDINGS OF FACT**

20 1. On or about August 29, 2006, Complainant Virginia Herold, in her official  
21 capacity as the Executive Officer of the Board of Pharmacy, Department of Consumer Affairs,  
22 filed Accusation No. 2990 against Roxana M. Johnson (Respondent) before the Board of  
23 Pharmacy.

24 2. On or about September 14, 1999, the Board of Pharmacy (Board) issued  
25 Pharmacy Technician Registration No. TCH 30754 to Respondent. The registration will expire  
26 on November 30, 2008.

27 3. On or about September 12, 2006, Mary Anne Snyder, an employee of the  
28 Department of Justice, served by Certified and First Class Mail a copy of the Accusation No.

1 2990, Statement to Respondent, Notice of Defense, Request for Discovery, and Government  
2 Code sections 11507.5, 11507.6, and 11507.7 to Respondent's address of record with the Board,  
3 which was and is P.O. Box 575, Citrus Heights, CA 95621. Also, on or about November 17,  
4 2006, Ms. Snyder, served by Certified and First Class Mail a copy of the Accusation No. 2990,  
5 Statement to Respondent, Notice of Defense, Request for Discovery, and Government Code  
6 sections 11507.5, 11507.6, and 11507.7 to Respondent's second address of record with the  
7 Board, which was and is 2916 Arcade Lake Lane, Citrus Heights, CA 95621. A copy of the  
8 Accusation, the related documents, and Declaration of Service are attached as Exhibit A, and  
9 are incorporated herein by reference.

10 4. Service of the Accusation was effective as a matter of law under the  
11 provisions of Government Code section 11505, subdivision (c).

12 5. On or about September 28, 2006, the aforementioned documents from  
13 Post Office Box 575, Citrus Heights, CA 95621, were returned by the U.S. Postal Service  
14 marked, "Unclaimed." On or about November 21, 2006, the aforementioned documents from  
15 7916 Arcade Lake Lane, Citrus Heights, CA 95621, were turned by the U.S. Postal Service  
16 marked, "Not Deliverable as addressed, Unable to forward. No Forward Order on File." A copy  
17 of the postal returned documents are attached hereto as Exhibit B, and are incorporated herein by  
18 reference.

19 6. Government Code section 11506 states, in pertinent part:

20 "(c) The respondent shall be entitled to a hearing on the merits if the respondent  
21 files a notice of defense, and the notice shall be deemed a specific denial of all parts of the  
22 accusation not expressly admitted. Failure to file a notice of defense shall constitute a waiver of  
23 respondent's right to a hearing, but the agency in its discretion may nevertheless grant a hearing."

24 7. Respondent failed to file a Notice of Defense within 15 days after service  
25 upon her of the Accusation, and therefore waived her right to a hearing on the merits of  
26 Accusation No. 2990.

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8. California Government Code section 11520 states, in pertinent part:

"(a) If the respondent either fails to file a notice of defense or to appear at the hearing, the agency may take action based upon the respondent's express admissions or upon other evidence and affidavits may be used as evidence without any notice to respondent."

9. Pursuant to its authority under Government Code section 11520, the Board finds Respondent is in default. The Board will take action without further hearing and, based on Respondent's express admissions by way of default and the evidence before it, contained in exhibits A, B and C, finds that the allegations in Accusation No. 2990 are true.

10. The total costs for investigation and enforcement are \$1,788.00 as of November 13, 2006. The cost certification is attached hereto as Exhibit C, and is incorporated herein by reference.

## DETERMINATION OF ISSUES

1. Based on the foregoing findings of fact, Respondent Roxana M. Johnson has subjected her Pharmacy Technician Registration No. TCH 30754 to discipline.

2. A copy of the Accusation and the related documents and Declaration of Service are attached.

3. The agency has jurisdiction to adjudicate this case by default.

4. The Board of Pharmacy is authorized to revoke Respondent's Pharmacy Technician Registration based upon the following violations alleged in the Accusation:

a. Business and Professions Code sections 4301(j) and 4324(a) and (b)(Forgery of Prescriptions).

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Pursuant to Government Code section 11520, subdivision (c), Respondent may serve a written motion requesting that the Decision be vacated and stating the grounds relied on within seven (7) days after service of the Decision on Respondent. The agency in its discretion may vacate the Decision and grant a hearing on a showing of good cause, as defined in the statute.

It is so ORDERED      May 15, 2007

By William Powers  
WILLIAM POWERS  
Board President

Exhibit A: Accusation No.2990, Related Documents, and Declaration of Service  
Exhibit B: Postal Return Documents  
Exhibit C: Certification of Costs: Declaration of Jana L. Tuton

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Exhibit A

Accusation No. 2990,  
Related Documents and Declaration of Service

1 BILL LOCKYER, Attorney General  
of the State of California  
2 JANA L. TUTON, State Bar No. 78206  
Deputy Attorney General  
3 California Department of Justice  
1300 I Street, Suite 125  
4 P.O. Box 944255  
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8 **BEFORE THE**  
9 **BOARD OF PHARMACY**  
10 **DEPARTMENT OF CONSUMER AFFAIRS**  
11 **STATE OF CALIFORNIA**

11 In the Matter of the Accusation Against:

Case No. 2990

12 ROXANA M. JOHNSON  
P.O. Box 575  
13 Citrus Heights, CA 95621

OAH No.

**A C C U S A T I O N**

14 Pharmacy Technician Reg. No. TCH 30754

15 Respondent.  
16

17 Complainant alleges:

18 PARTIES

19 1. Virginia Herold (Complainant) brings this Accusation solely in her official  
20 capacity as the Interim Executive Officer of the Board of Pharmacy, Department of Consumer  
21 Affairs.

22 2. On or about September 14, 1999, the Board of Pharmacy issued Pharmacy  
23 Technician Registration Number TCH 30754 to Roxana M. Johnson (Respondent). The  
24 registration will expire on November 30, 2006, unless renewed.

25 JURISDICTION

26 3. This Accusation is brought before the Board of Pharmacy (Board),  
27 Department of Consumer Affairs, under the authority of the following laws. All section  
28 references are to the Business and Professions Code unless otherwise indicated.

1                   4.       Section 125.3 of the Code states, in pertinent part, that the Board may  
2 request the administrative law judge to direct a licensee found to have committed a violation or  
3 violations of the licensing act to pay a sum not to exceed the reasonable costs of the investigation  
4 and enforcement of the case.

5                   5.       Section 4301 of the Code states, in pertinent part:

6                   The board shall take action against any holder of a license  
7 who is guilty of unprofessional conduct or whose license has been  
8 procured by fraud or misrepresentation or issued by mistake.  
Unprofessional conduct shall include, but is not limited to, any of  
the following:

9                   (j) The violation of any of the statutes of this state or of the  
10 United States regulating controlled substances and dangerous  
drugs.

11                  6.       Section 4324 of the Code states:

12                  (a) Every person who signs the name of another, or of a  
13 fictitious person, or falsely makes, alters, forges, utters, publishes,  
14 passes, or attempts to pass, as genuine, any prescription for any  
15 drugs is guilty of forgery and upon conviction thereof shall be  
punished by imprisonment in the state prison, or by imprisonment  
in the county jail for not more than one year.

16                  (b) Every person who has in his or her possession any drugs  
17 secured by a forged prescription shall be punished by  
imprisonment in the state prison, or by imprisonment in the county  
jail for not more than one year.

18                                   CAUSE FOR DISCIPLINE

19                                   (Forgery of Prescriptions)

20                  7.       Respondent is subject to disciplinary action under sections 4301 (j) and  
21 4324 (a) in that on or about between August 1, 2004 and December 31, 2004, while employed as  
22 a pharmacy technician at the Placer County Medical Clinic Pharmacy, respondent falsely made  
23 and forged prescriptions for Premarin and Ultram, which are dangerous drugs within the meaning  
24 of section 4022.

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PRAYER

WHEREFORE, Complainant requests that a hearing be held on the matters herein alleged, and that following the hearing, the Board of Pharmacy issue a decision:

A. Revoking or suspending Pharmacy Technician Registration Number TCH 30754, issued to Roxana M. Johnson;

B. Ordering Roxana M. Johnson to pay the Board of Pharmacy the reasonable costs of the investigation and enforcement of this case, pursuant to Business and Professions Code section 125.3;

C. Taking such other and further action as deemed necessary and proper.

DATED: 8/29/06

  
VIRGINIA HEROLD  
Interim Executive Officer  
Board of Pharmacy  
Department of Consumer Affairs  
State of California  
Complainant

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BILL LOCKYER, Attorney General  
of the State of California  
JANA L. TUTON, State Bar No. 78206  
Deputy Attorney General  
California Department of Justice  
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Attorneys for Complainant

**BEFORE THE  
BOARD OF PHARMACY  
DEPARTMENT OF CONSUMER AFFAIRS  
STATE OF CALIFORNIA**

In the Matter of the Accusation Against:

ROXANA M. JOHNSON

Respondent.

Case No. 2990

**REQUEST FOR DISCOVERY**

[Gov. Code § 11507.6]

**TO RESPONDENT:**

Under section 11507.6 of the Government Code of the State of California, parties to an administrative hearing, including the Complainant, are entitled to certain information concerning the opposing party's case. A copy of the provisions of section 11507.6 of the Government Code concerning such rights is included among the papers served.

**PURSUANT TO SECTION 11507.6 OF THE GOVERNMENT CODE, YOU  
ARE HEREBY REQUESTED TO:**

1. Provide the names and addresses of witnesses to the extent known to the Respondent, including, but not limited to, those intended to be called to testify at the hearing, and
2. Provide an opportunity for the Complainant to inspect and make a copy of any of the following in the possession or custody or under control of the Respondent:
  - a. A statement of a person, other than the Respondent, named in the initial administrative pleading, or in any additional pleading, when it is claimed that the act or

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1 omission of the Respondent as to this person is the basis for the administrative  
2 proceeding;

3 b. A statement pertaining to the subject matter of the proceeding made by any  
4 party to another party or persons;

5 c. Statements of witnesses then proposed to be called by the Respondent and  
6 of other persons having personal knowledge of the acts, omissions or events which are the  
7 basis for the proceeding, not included in (a) or (b) above;

8 d. All writings, including but not limited to reports of mental, physical and  
9 blood examinations and things which the Respondent now proposes to offer in evidence;

10 e. Any other writing or thing which is relevant and which would be  
11 admissible in evidence, including but not limited to, any patient or hospital records  
12 pertaining to the persons named in the pleading;

13 f. Investigative reports made by or on behalf of the Respondent pertaining to  
14 the subject matter of the proceeding, to the extent that these reports (1) contain the names  
15 and addresses of witnesses or of persons having personal knowledge of the acts,  
16 omissions or events which are the basis for the proceeding, or (2) reflect matters  
17 perceived by the investigator in the course of his or her investigation, or (3) contain or  
18 include by attachment any statement or writing described in (a) to (e), inclusive, or  
19 summary thereof.

20 For the purpose of this Request for Discovery, "statements" include written  
21 statements by the person, signed, or otherwise authenticated by him or her, stenographic,  
22 mechanical, electrical or other recordings, or transcripts thereof, of oral statements by the person,  
23 and written reports or summaries of these oral statements.

24 YOU ARE HEREBY FURTHER NOTIFIED that nothing in this Request for  
25 Discovery should be deemed to authorize the inspection or copying of any writing or thing which  
26 is privileged from disclosure by law or otherwise made confidential or protected as attorney's  
27 work product.


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1 Your response to this Request for Discovery should be directed to the undersigned  
2 attorney for the Complainant at the address on the first page of this Request for Discovery **within**  
3 **30 days after service** of the Accusation.

4 Failure without substantial justification to comply with this Request for Discovery  
5 may subject the Respondent to sanctions pursuant to sections 11507.7 and 11455.10 to 11455.30  
6 of the Government Code.

7 DATED: 9-12-06

8 BILL LOCKYER, Attorney General  
9 of the State of California

10   
11 JANA L. TUTON  
12 Deputy Attorney General  
13 Attorneys for Complainant

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Attorneys for Complainant

**BEFORE THE  
BOARD OF PHARMACY  
DEPARTMENT OF CONSUMER AFFAIRS  
STATE OF CALIFORNIA**

In the Matter of the Accusation Against:

ROXANA M. JOHNSON

Respondent.

Case No. 2990

**STATEMENT TO RESPONDENT**

[Gov. Code §§ 11504, 11505(b)]

TO RESPONDENT:

Enclosed is a copy of the Accusation that has been filed with the Board of  
Pharmacy of the Department of Consumer Affairs (Board), and which is hereby served on you.

Unless a written request for a hearing signed by you or on your behalf is delivered  
or mailed to the Board, represented by Deputy Attorney General Jana L. Tuton, within fifteen  
(15) days after a copy of the Accusation was personally served on you or mailed to you, you will  
be deemed to have waived your right to a hearing in this matter and the Board may proceed upon  
the Accusation without a hearing and may take action thereon as provided by law.

The request for hearing may be made by delivering or mailing one of the enclosed  
forms entitled "Notice of Defense," or by delivering or mailing a Notice of Defense as provided  
in section 11506 of the Government Code, to

**Jana L. Tuton  
Deputy Attorney General  
1300 I Street, Suite 125  
P.O. Box 944255  
Sacramento, California 94244-2550.**

1           You may, but need not, be represented by counsel at any or all stages of these  
2 proceedings.

3           The enclosed Notice of Defense, if signed and filed with the Board, shall be  
4 deemed a specific denial of all parts of the Accusation, but you will not be permitted to raise any  
5 objection to the form of the Accusation unless you file a further Notice of Defense as provided in  
6 section 11506 of the Government Code within fifteen (15) days after service of the Accusation  
7 on you.

8           If you file any Notice of Defense within the time permitted, a hearing will be held  
9 on the charges made in the Accusation.

10          The hearing may be postponed for good cause. If you have good cause, you are  
11 obliged to notify the Office of Administrative Hearings, 560 J Street, Suite 340/360, Sacramento,  
12 California 95814, within ten (10) working days after you discover the good cause. Failure to  
13 notify the Office of Administrative Hearings within ten (10) days will deprive you of a  
14 postponement.

15          Copies of sections 11507.5, 11507.6, and 11507.7 of the Government Code are  
16 enclosed.

17          If you desire the names and addresses of witnesses or an opportunity to inspect  
18 and copy the items mentioned in section 11507.6 of the Government Code in the possession,  
19 custody or control of the Board you may send a Request for Discovery to the above designated  
20 Deputy Attorney General.

21                   **NOTICE REGARDING STIPULATED SETTLEMENTS**

22          It may be possible to avoid the time, expense and uncertainties involved in an  
23 administrative hearing by disposing of this matter through a stipulated settlement. A stipulated  
24 settlement is a binding written agreement between you and the government regarding the matters  
25 charged and the discipline to be imposed. Such a stipulation would have to be approved by the  
26 Board of Pharmacy but, once approved, it would be incorporated into a final order.

27          Any stipulation must be consistent with the Board's established disciplinary  
28 guidelines; however, all matters in mitigation or aggravation will be considered. A copy of the

1 Board's Disciplinary Guidelines will be provided to you on your written request to the state  
2 agency bringing this action.

3 If you are interested in pursuing this alternative to a formal administrative hearing,  
4 or if you have any questions, you or your attorney should contact Deputy Attorney General Jana  
5 L. Tuton at the earliest opportunity.

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**BEFORE THE  
BOARD OF PHARMACY  
DEPARTMENT OF CONSUMER AFFAIRS  
STATE OF CALIFORNIA**

In the Matter of the Accusation Against:

ROXANA M. JOHNSON

Respondent.

Case No. 2990

**NOTICE OF DEFENSE**

[Gov. Code §§ 11505 and 11506]

I, the undersigned Respondent in the above-entitled proceeding, hereby acknowledge receipt of a copy of the Accusation; Statement to Respondent; Government Code sections 11507.5, 11507.6 and 11507.7, Complainant's Request for Discovery; and two copies of a Notice of Defense.

I hereby request a hearing to permit me to present my defense to the charges contained in the Accusation.

DATED: \_\_\_\_\_

Respondent's Name

Respondent's Signature

Respondent's Mailing Address

City, State and Zip Code

Respondent's Telephone Number

**Check appropriate box:**

- ☐ I do not consent to electronic reporting.

The hearing in this case will be electronically reported/recorded, unless you check the above-left box to indicate that you do not consent to electronic recording, in which case the hearing will be reported by a stenographic reporter. If you do not check this box, you may withdraw your consent to electronic recording at any point up to fifteen (15) calendar days prior to the date set for hearing, by a written statement served on the Office of Administrative Hearings and on counsel for Complainant. If the box is not checked, and no written withdrawal of consent is served on the Office of Administrative Hearing and on counsel for Complainant by fifteen (15) calendar days prior to the hearing, you waive any right to stenographic reporting.

- ☐ I am represented by counsel, whose name, address and telephone number appear below:

Counsel's Name

Counsel's Mailing Address

City, State and Zip Code

Counsel's Telephone Number

- ☐ I am not now represented by counsel. If and when counsel is retained, immediate notification of the attorney's name, address and telephone number will be filed with the Office of Administrative Hearing and a copy sent to counsel for Complainant so that counsel will be on record to receive legal notices, pleadings and other papers.

The agency taking the action described in the Accusation may have formulated guidelines to assist the administrative law judge in reaching an appropriate penalty. You may obtain a copy of the guidelines by requesting them from the agency in writing.

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**BEFORE THE  
BOARD OF PHARMACY  
DEPARTMENT OF CONSUMER AFFAIRS  
STATE OF CALIFORNIA**

In the Matter of the Accusation Against:

ROXANA M. JOHNSON

Respondent.

Case No. 2990

**NOTICE OF DEFENSE**

[Gov. Code §§ 11505 and 11506]

I, the undersigned Respondent in the above-entitled proceeding, hereby acknowledge receipt of a copy of the Accusation; Statement to Respondent; Government Code sections 11507.5, 11507.6 and 11507.7, Complainant's Request for Discovery; and two copies of a Notice of Defense.

I hereby request a hearing to permit me to present my defense to the charges contained in the Accusation.

DATED: \_\_\_\_\_

Respondent's Name

Respondent's Signature

Respondent's Mailing Address

City, State and Zip Code

Respondent's Telephone Number

**Check appropriate box:**

- ☐ I do not consent to electronic reporting.

The hearing in this case will be electronically reported/recorded, unless you check the above-left box to indicate that you do not consent to electronic recording, in which case the hearing will be reported by a stenographic reporter. If you do not check this box, you may withdraw your consent to electronic recording at any point up to fifteen (15) calendar days prior to the date set for hearing, by a written statement served on the Office of Administrative Hearings and on counsel for Complainant. If the box is not checked, and no written withdrawal of consent is served on the Office of Administrative Hearing and on counsel for Complainant by fifteen (15) calendar days prior to the hearing, you waive any right to stenographic reporting.

- ☐ I am represented by counsel, whose name, address and telephone number appear below:

Counsel's Name

Counsel's Mailing Address

City, State and Zip Code

Counsel's Telephone Number

- ☐ I am not now represented by counsel. If and when counsel is retained, immediate notification of the attorney's name, address and telephone number will be filed with the Office of Administrative Hearing and a copy sent to counsel for Complainant so that counsel will be on record to receive legal notices, pleadings and other papers.

The agency taking the action described in the Accusation may have formulated guidelines to assist the administrative law judge in reaching an appropriate penalty. You may obtain a copy of the guidelines by requesting them from the agency in writing.

10273598.wpd

**COPY OF GOVERNMENT CODE SECTIONS 11507.5, 11507.6 AND 11507.7**  
**PROVIDED PURSUANT TO GOVERNMENT CODE SECTIONS 11504 AND 11505**

**SECTION 11507.5: Exclusivity of discovery provisions**

The provisions of Section 11507.6 provide the exclusive right to and method of discovery as to any proceeding governed by this chapter.

**SECTION 11507.6: Request for discovery**

After initiation of a proceeding in which a respondent or other party is entitled to a hearing on the merits, a party, upon written request made to another party, prior to the hearing and within 30 days after service by the agency of the initial pleading or within 15 days after the service of an additional pleading, is entitled to (1) obtain the names and addresses of witnesses to the extent known to the other party, including, but not limited to, those intended to be called to testify at the hearing, and (2) inspect and make a copy of any of the following in the possession or custody or under the control of the other party:

(a) A statement of a person, other than the respondent, named in the initial administrative pleading, or in any additional pleading, when it is claimed that the act or omission of the respondent as to this person is the basis for the administrative proceeding;

(b) A statement pertaining to the subject matter of the proceeding made by any party to another party or person;

(c) Statements of witnesses then proposed to be called by the party and of other persons having personal knowledge of the acts, omissions or events which are the basis for the proceeding, not included in (a) or (b) above;

(d) All writings, including, but not limited to, reports of mental, physical and blood-examinations and things which the party then proposes to offer in evidence;

(e) Any other writing or thing which is relevant and which would be admissible in evidence;

(f) Investigative reports made by or on behalf of the agency or other party pertaining to the subject matter of the proceeding, to the extent that these reports (1) contain the names and addresses of witnesses or of persons having personal knowledge of the acts, omissions or events which are the basis for the proceeding, or (2) reflect matters perceived by the investigator in the course of his or her investigation, or (3) contain or include by attachment any statement or writing described in (a) to (e), inclusive, or summary thereof.

For the purpose of this section, "statements" include written statements by the person signed or otherwise authenticated by him or her, stenographic, mechanical, electrical or other recordings, or transcripts thereof, of oral statements by the person, and written reports or summaries of these oral statements.

Nothing in this section shall authorize the inspection or copying of any writing or thing which is privileged from disclosure by law or otherwise made confidential or protected as the attorney's work product.

## **SECTION 11507.7: Petition to compel discovery; Order; Sanctions**

(a) Any party claiming the party's request for discovery pursuant to Section 11507.6 has not been complied with may serve and file with the administrative law judge a motion to compel discovery, naming as respondent the party refusing or failing to comply with Section 11507.6. The motion shall state facts showing the respondent party failed or refused to comply with Section 11507.6, a description of the matters sought to be discovered, the reason or reasons why the matter is discoverable under that section, that a reasonable and good faith attempt to contact the respondent for an informal resolution of the issue has been made, and the ground or grounds of respondent's refusal so far as known to the moving party.

(b) The motion shall be served upon respondent party and filed within 15 days after the respondent party first evidenced failure or refusal to comply with Section 11507.6 or within 30 days after request was made and the party has failed to reply to the request, or within another time provided by stipulation, whichever period is longer.

(c) The hearing on the motion to compel discovery shall be held within 15 days after the motion is made, or a later time that the administrative law judge may on the judge's own motion for good cause determine. The respondent party shall have the right to serve and file a written answer or other response to the motion before or at the time of the hearing.

(d) Where the matter sought to be discovered is under the custody or control of the respondent party and the respondent party asserts that the matter is not a discoverable matter under the provisions of Section 11507.6, or is privileged against disclosure under those provisions, the administrative law judge may order lodged with it matters provided in subdivision (b) of Section 915 of the Evidence Code and examine the matters in accordance with its provisions.

(e) The administrative law judge shall decide the case on the matters examined in camera, the papers filed by the parties, and such oral argument and additional evidence as the administrative law judge may allow.

(f) Unless otherwise stipulated by the parties, the administrative law judge shall no later than 15 days after the hearing make its order denying or granting the motion. The order shall be in writing setting forth the matters the moving party is entitled to discover under Section 11507.6. A copy of the order shall forthwith be served by mail by the administrative law judge upon the parties. Where the order grants the motion in whole or in part, the order shall not become effective until 10 days after the date the order is served. Where the order denies relief to the moving party, the order shall be effective on the date it is served.

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BILL LOCKYER, Attorney General  
of the State of California  
JANA L. TUTON, State Bar No. 78206  
Deputy Attorney General  
California Department of Justice  
1300 I Street, Suite 125  
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Attorneys for Complainant

**BEFORE THE  
BOARD OF PHARMACY  
DEPARTMENT OF CONSUMER AFFAIRS  
STATE OF CALIFORNIA**

In the Matter of the Accusation Against:

ROXANA M. JOHNSON

Respondent.

Case No. 2990

**REQUEST FOR DISCOVERY**

[Gov. Code § 11507.6]

**TO RESPONDENT:**

Under section 11507.6 of the Government Code of the State of California, parties to an administrative hearing, including the Complainant, are entitled to certain information concerning the opposing party's case. A copy of the provisions of section 11507.6 of the Government Code concerning such rights is included among the papers served.

**PURSUANT TO SECTION 11507.6 OF THE GOVERNMENT CODE, YOU  
ARE HEREBY REQUESTED TO:**

1. Provide the names and addresses of witnesses to the extent known to the Respondent, including, but not limited to, those intended to be called to testify at the hearing, and
2. Provide an opportunity for the Complainant to inspect and make a copy of any of the following in the possession or custody or under control of the Respondent:
  - a. A statement of a person, other than the Respondent, named in the initial administrative pleading, or in any additional pleading, when it is claimed that the act or

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1 omission of the Respondent as to this person is the basis for the administrative  
2 proceeding;

3 b. A statement pertaining to the subject matter of the proceeding made by any  
4 party to another party or persons;

5 c. Statements of witnesses then proposed to be called by the Respondent and  
6 of other persons having personal knowledge of the acts, omissions or events which are the  
7 basis for the proceeding, not included in (a) or (b) above;

8 d. All writings, including but not limited to reports of mental, physical and  
9 blood examinations and things which the Respondent now proposes to offer in evidence;

10 e. Any other writing or thing which is relevant and which would be  
11 admissible in evidence, including but not limited to, any patient or hospital records  
12 pertaining to the persons named in the pleading;

13 f. Investigative reports made by or on behalf of the Respondent pertaining to  
14 the subject matter of the proceeding, to the extent that these reports (1) contain the names  
15 and addresses of witnesses or of persons having personal knowledge of the acts,  
16 omissions or events which are the basis for the proceeding, or (2) reflect matters  
17 perceived by the investigator in the course of his or her investigation, or (3) contain or  
18 include by attachment any statement or writing described in (a) to (e), inclusive, or  
19 summary thereof.

20 For the purpose of this Request for Discovery, "statements" include written  
21 statements by the person, signed, or otherwise authenticated by him or her, stenographic,  
22 mechanical, electrical or other recordings, or transcripts thereof, of oral statements by the person,  
23 and written reports or summaries of these oral statements.

24 YOU ARE HEREBY FURTHER NOTIFIED that nothing in this Request for  
25 Discovery should be deemed to authorize the inspection or copying of any writing or thing which  
26 is privileged from disclosure by law or otherwise made confidential or protected as attorney's  
27 work product.

28 ///

1           Your response to this Request for Discovery should be directed to the undersigned  
2 attorney for the Complainant at the address on the first page of this Request for Discovery **within**  
3 **30 days after service** of the Accusation.

4           Failure without substantial justification to comply with this Request for Discovery  
5 may subject the Respondent to sanctions pursuant to sections 11507.7 and 11455.10 to 11455.30  
6 of the Government Code.

7 DATED: \_\_\_\_\_

8                               BILL LOCKYER, Attorney General  
9                               of the State of California

10  
11                               \_\_\_\_\_  
12                               JANA L. TUTON  
13                               Deputy Attorney General

14                               Attorneys for Complainant

15 10273598.wpd

BILL LOCKYER, Attorney General  
of the State of California  
JANA L. TUTON, State Bar No. 78206  
Deputy Attorney General  
California Department of Justice  
1300 I Street, Suite 125  
P.O. Box 944255  
Sacramento, CA 94244-2550  
Telephone: (916) 324-5342  
Facsimile: (916) 327-8643

Attorneys for Complainant

**BEFORE THE  
BOARD OF PHARMACY  
DEPARTMENT OF CONSUMER AFFAIRS  
STATE OF CALIFORNIA**

In the Matter of the Accusation Against:

ROXANA M. JOHNSON

Respondent.

Case No. 2990

**STATEMENT TO RESPONDENT**

[Gov. Code §§ 11504, 11505(b)]

TO RESPONDENT:

Enclosed is a copy of the Accusation that has been filed with the Board of  
Pharmacy of the Department of Consumer Affairs (Board), and which is hereby served on you.

Unless a written request for a hearing signed by you or on your behalf is delivered  
or mailed to the Board, represented by Deputy Attorney General Jana L. Tuton, within fifteen  
(15) days after a copy of the Accusation was personally served on you or mailed to you, you will  
be deemed to have waived your right to a hearing in this matter and the Board may proceed upon  
the Accusation without a hearing and may take action thereon as provided by law.

The request for hearing may be made by delivering or mailing one of the enclosed  
forms entitled "Notice of Defense," or by delivering or mailing a Notice of Defense as provided  
in section 11506 of the Government Code, to

**Jana L. Tuton  
Deputy Attorney General  
1300 I Street, Suite 125  
P.O. Box 944255  
Sacramento, California 94244-2550.**

1           You may, but need not, be represented by counsel at any or all stages of these  
2 proceedings.

3           The enclosed Notice of Defense, if signed and filed with the Board, shall be  
4 deemed a specific denial of all parts of the Accusation, but you will not be permitted to raise any  
5 objection to the form of the Accusation unless you file a further Notice of Defense as provided in  
6 section 11506 of the Government Code within fifteen (15) days after service of the Accusation  
7 on you.

8           If you file any Notice of Defense within the time permitted, a hearing will be held  
9 on the charges made in the Accusation.

10          The hearing may be postponed for good cause. If you have good cause, you are  
11 obliged to notify the Office of Administrative Hearings, 560 J Street, Suite 340/360, Sacramento,  
12 California 95814, within ten (10) working days after you discover the good cause. Failure to  
13 notify the Office of Administrative Hearings within ten (10) days will deprive you of a  
14 postponement.

15          Copies of sections 11507.5, 11507.6, and 11507.7 of the Government Code are  
16 enclosed.

17          If you desire the names and addresses of witnesses or an opportunity to inspect  
18 and copy the items mentioned in section 11507.6 of the Government Code in the possession,  
19 custody or control of the Board you may send a Request for Discovery to the above designated  
20 Deputy Attorney General.

21                   **NOTICE REGARDING STIPULATED SETTLEMENTS**

22          It may be possible to avoid the time, expense and uncertainties involved in an  
23 administrative hearing by disposing of this matter through a stipulated settlement. A stipulated  
24 settlement is a binding written agreement between you and the government regarding the matters  
25 charged and the discipline to be imposed. Such a stipulation would have to be approved by the  
26 Board of Pharmacy but, once approved, it would be incorporated into a final order.

27          Any stipulation must be consistent with the Board's established disciplinary  
28 guidelines; however, all matters in mitigation or aggravation will be considered. A copy of the

Board's Disciplinary Guidelines will be provided to you on your written request to the state agency bringing this action.

If you are interested in pursuing this alternative to a formal administrative hearing, or if you have any questions, you or your attorney should contact Deputy Attorney General Jana L. Tuton at the earliest opportunity.

\*\*\*\*\*

SA2006101290  
10273598.wpd

**BEFORE THE  
BOARD OF PHARMACY  
DEPARTMENT OF CONSUMER AFFAIRS  
STATE OF CALIFORNIA**

In the Matter of the Accusation Against:

ROXANA M. JOHNSON

Respondent.

Case No. 2990

**NOTICE OF DEFENSE**

[Gov. Code §§ 11505 and 11506]

I, the undersigned Respondent in the above-entitled proceeding, hereby acknowledge receipt of a copy of the Accusation; Statement to Respondent; Government Code sections 11507.5, 11507.6 and 11507.7, Complainant's Request for Discovery; and two copies of a Notice of Defense.

I hereby request a hearing to permit me to present my defense to the charges contained in the Accusation.

DATED: \_\_\_\_\_

Respondent's Name

Respondent's Signature

Respondent's Mailing Address

City, State and Zip Code

Respondent's Telephone Number

**Check appropriate box:**

- ☐ I do not consent to electronic reporting.

The hearing in this case will be electronically reported/recorded, unless you check the above-left box to indicate that you do not consent to electronic recording, in which case the hearing will be reported by a stenographic reporter. If you do not check this box, you may withdraw your consent to electronic recording at any point up to fifteen (15) calendar days prior to the date set for hearing, by a written statement served on the Office of Administrative Hearings and on counsel for Complainant. If the box is not checked, and no written withdrawal of consent is served on the Office of Administrative Hearing and on counsel for Complainant by fifteen (15) calendar days prior to the hearing, you waive any right to stenographic reporting.

- ☐ I am represented by counsel, whose name, address and telephone number appear below:

Counsel's Name

Counsel's Mailing Address

City, State and Zip Code

Counsel's Telephone Number

- ☐ I am not now represented by counsel. If and when counsel is retained, immediate notification of the attorney's name, address and telephone number will be filed with the Office of Administrative Hearing and a copy sent to counsel for Complainant so that counsel will be on record to receive legal notices, pleadings and other papers.

The agency taking the action described in the Accusation may have formulated guidelines to assist the administrative law judge in reaching an appropriate penalty. You may obtain a copy of the guidelines by requesting them from the agency in writing.

10273598.wpd

**BEFORE THE  
BOARD OF PHARMACY  
DEPARTMENT OF CONSUMER AFFAIRS  
STATE OF CALIFORNIA**

In the Matter of the Accusation Against:

ROXANA M. JOHNSON

Respondent.

Case No. 2990

**NOTICE OF DEFENSE**

[Gov. Code §§ 11505 and 11506]

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I hereby request a hearing to permit me to present my defense to the charges contained in the Accusation.

DATED: \_\_\_\_\_

Respondent's Name

Respondent's Signature

Respondent's Mailing Address

City, State and Zip Code

Respondent's Telephone Number

**Check appropriate box:**

- ☐ I do not consent to electronic reporting.

The hearing in this case will be electronically reported/recorded, unless you check the above-left box to indicate that you do not consent to electronic recording, in which case the hearing will be reported by a stenographic reporter. If you do not check this box, you may withdraw your consent to electronic recording at any point up to fifteen (15) calendar days prior to the date set for hearing, by a written statement served on the Office of Administrative Hearings and on counsel for Complainant. If the box is not checked, and no written withdrawal of consent is served on the Office of Administrative Hearing and on counsel for Complainant by fifteen (15) calendar days prior to the hearing, you waive any right to stenographic reporting.

- ☐ I am represented by counsel, whose name, address and telephone number appear below:

Counsel's Name

Counsel's Mailing Address

City, State and Zip Code

Counsel's Telephone Number

- ☐ I am not now represented by counsel. If and when counsel is retained, immediate notification of the attorney's name, address and telephone number will be filed with the Office of Administrative Hearing and a copy sent to counsel for Complainant so that counsel will be on record to receive legal notices, pleadings and other papers.

The agency taking the action described in the Accusation may have formulated guidelines to assist the administrative law judge in reaching an appropriate penalty. You may obtain a copy of the guidelines by requesting them from the agency in writing.

10273598.wpd

**COPY OF GOVERNMENT CODE SECTIONS 11507.5, 11507.6 AND 11507.7**  
**PROVIDED PURSUANT TO GOVERNMENT CODE SECTIONS 11504 AND 11505**

**SECTION 11507.5: Exclusivity of discovery provisions**

The provisions of Section 11507.6 provide the exclusive right to and method of discovery as to any proceeding governed by this chapter.

**SECTION 11507.6: Request for discovery**

After initiation of a proceeding in which a respondent or other party is entitled to a hearing on the merits, a party, upon written request made to another party, prior to the hearing and within 30 days after service by the agency of the initial pleading or within 15 days after the service of an additional pleading, is entitled to (1) obtain the names and addresses of witnesses to the extent known to the other party, including, but not limited to, those intended to be called to testify at the hearing, and (2) inspect and make a copy of any of the following in the possession or custody or under the control of the other party:

(a) A statement of a person, other than the respondent, named in the initial administrative pleading, or in any additional pleading, when it is claimed that the act or omission of the respondent as to this person is the basis for the administrative proceeding;

(b) A statement pertaining to the subject matter of the proceeding made by any party to another party or person;

(c) Statements of witnesses then proposed to be called by the party and of other persons having personal knowledge of the acts, omissions or events which are the basis for the proceeding, not included in (a) or (b) above;

(d) All writings, including, but not limited to, reports of mental, physical and blood examinations and things which the party then proposes to offer in evidence;

(e) Any other writing or thing which is relevant and which would be admissible in evidence;

(f) Investigative reports made by or on behalf of the agency or other party pertaining to the subject matter of the proceeding, to the extent that these reports (1) contain the names and addresses of witnesses or of persons having personal knowledge of the acts, omissions or events which are the basis for the proceeding, or (2) reflect matters perceived by the investigator in the course of his or her investigation, or (3) contain or include by attachment any statement or writing described in (a) to (e), inclusive, or summary thereof.

For the purpose of this section, "statements" include written statements by the person signed or otherwise authenticated by him or her, stenographic, mechanical, electrical or other recordings, or transcripts thereof, of oral statements by the person, and written reports or summaries of these oral statements.

Nothing in this section shall authorize the inspection or copying of any writing or thing which is privileged from disclosure by law or otherwise made confidential or protected as the attorney's work product.

## **SECTION 11507.7: Petition to compel discovery; Order; Sanctions**

(a) Any party claiming the party's request for discovery pursuant to Section 11507.6 has not been complied with may serve and file with the administrative law judge a motion to compel discovery, naming as respondent the party refusing or failing to comply with Section 11507.6. The motion shall state facts showing the respondent party failed or refused to comply with Section 11507.6, a description of the matters sought to be discovered, the reason or reasons why the matter is discoverable under that section, that a reasonable and good faith attempt to contact the respondent for an informal resolution of the issue has been made, and the ground or grounds of respondent's refusal so far as known to the moving party.

(b) The motion shall be served upon respondent party and filed within 15 days after the respondent party first evidenced failure or refusal to comply with Section 11507.6 or within 30 days after request was made and the party has failed to reply to the request, or within another time provided by stipulation, whichever period is longer.

(c) The hearing on the motion to compel discovery shall be held within 15 days after the motion is made, or a later time that the administrative law judge may on the judge's own motion for good cause determine. The respondent party shall have the right to serve and file a written answer or other response to the motion before or at the time of the hearing.

(d) Where the matter sought to be discovered is under the custody or control of the respondent party and the respondent party asserts that the matter is not a discoverable matter under the provisions of Section 11507.6, or is privileged against disclosure under those provisions, the administrative law judge may order lodged with it matters provided in subdivision (b) of Section 915 of the Evidence Code and examine the matters in accordance with its provisions.

(e) The administrative law judge shall decide the case on the matters examined in camera, the papers filed by the parties, and such oral argument and additional evidence as the administrative law judge may allow.

(f) Unless otherwise stipulated by the parties, the administrative law judge shall no later than 15 days after the hearing make its order denying or granting the motion. The order shall be in writing setting forth the matters the moving party is entitled to discover under Section 11507.6. A copy of the order shall forthwith be served by mail by the administrative law judge upon the parties. Where the order grants the motion in whole or in part, the order shall not become effective until 10 days after the date the order is served. Where the order denies relief to the moving party, the order shall be effective on the date it is served.

\*\*\*\*\*

**DECLARATION OF SERVICE**

(Certified & First Class Mail (separate mailing))

In the Matter of the Accusation Against:  
Roxana M. Johnson

OAH No.

Board of Pharmacy Case No. 2990

I declare:

I am employed in the Office of the Attorney General, which is the office of a member of the California State Bar at which member's direction this service is made. I am 18 years of age or older and not a party to this matter; my business address is 1300 I Street, P.O. Box 944255, Sacramento, CA 94244-2550

I am familiar with the business practice at the Office of the Attorney General for collection and processing of correspondence for mailing with the United States Postal Service. In accordance with that practice, correspondence placed in the internal mail collection system at the Office of the Attorney General is deposited with the United States Postal Service that same day in the ordinary course of business.

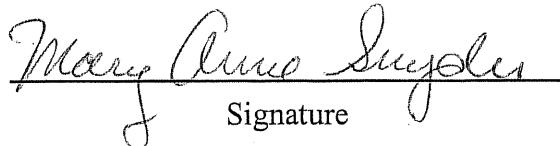
On September 12, 2006, I served the attached **Accusation, Statement to Respondent, Request for Discovery, Notice of Defense (2 copies), and Government Code sections** by placing a true copy thereof enclosed in a sealed envelope as certified mail with postage thereon fully prepaid and return receipt requested, and another true copy of the **Accusation, Statement to Respondent, Request for Discovery, Notice of Defense (2 copies), and Government Code sections** was enclosed in a second sealed envelope as first class mail with postage thereon fully prepaid, in the internal mail collection system at the Office of the Attorney General, addressed as follows:

Roxana M. Johnson  
P.O. Box 575  
Citrus Heights, CA 95621  
Respondent  
**Cert. Article No. 7160 3901 9848 9138 1275**

I declare under penalty of perjury under the laws of the State of California the foregoing is true and correct and that this declaration was executed on September 12, 2006, at Sacramento, California.

Mary Anne Snyder

Typed Name

  
Signature

cc: Kim DeLong, Enforcement Analyst, Pharmacy Board

7160 3901 9678 9138 1275

**TO:**  
Roxana M. Johnson  
P.O. Box 575  
Citrus Heights, CA 95621

**SENDER:** Jana L. Tuton, DAG

**REFERENCE:** Johnson/AccusPkt

PS Form 3800, June 2000

RETURN RECEIPT SERVICE	Postage	
	Certified Fee	
	Return Receipt Fee	
	Restricted Delivery	
	Total Postage & Fees	

US Postal Service  
**Receipt for  
Certified Mail**

No Insurance Coverage Provided  
Do Not Use for International Mail

POSTMARK OR DATE

09/12/06

**DECLARATION OF SERVICE**

(Certified & First Class Mail (separate mailing))

In the Matter of the Accusation Against:  
Roxana M. Johnson

OAH No.

Board of Pharmacy Case No. 2990

I declare:

I am employed in the Office of the Attorney General, which is the office of a member of the California State Bar at which member's direction this service is made. I am 18 years of age or older and not a party to this matter; my business address is 1300 I Street, P.O. Box 944255, Sacramento, CA 94244-2550

I am familiar with the business practice at the Office of the Attorney General for collection and processing of correspondence for mailing with the United States Postal Service. In accordance with that practice, correspondence placed in the internal mail collection system at the Office of the Attorney General is deposited with the United States Postal Service that same day in the ordinary course of business.

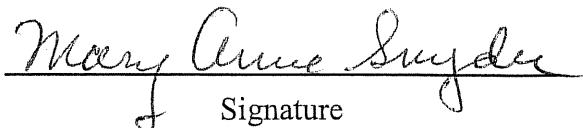
On November 17, 2006, I served the attached **Accusation, Statement to Respondent, Request for Discovery, Notice of Defense (2 copies), and Government Code sections** by placing a true copy thereof enclosed in a sealed envelope as certified mail with postage thereon fully prepaid and return receipt requested, and another true copy of the **Accusation, Statement to Respondent, Request for Discovery, Notice of Defense (2 copies), and Government Code sections** was enclosed in a second sealed envelope as first class mail with postage thereon fully prepaid, in the internal mail collection system at the Office of the Attorney General, addressed as follows:

Roxana M. Johnson  
7916 Arcade Lake Lane  
Citrus Heights, CA 95621  
Respondent  
**Cert. Article No. 7160 3901 9848 9137 8664**

I declare under penalty of perjury under the laws of the State of California the foregoing is true and correct and that this declaration was executed on November 17, 2006, at Sacramento, California.

Mary Anne Snyder

Typed Name

  
Signature

7160 3901 9848 9137 8664

**TO:**

Roxana M. Johnson  
7916 Arcade Lake Lane  
Citrus Heights, CA 95621

**SENDER:**

Jana L. Tuton, DAG

**REFERENCE:**

R.Johnson/AccusPkt

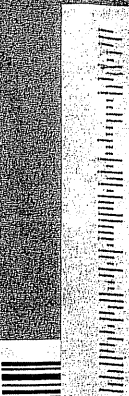
PS Form 3800, June 2000

RETURN RECEIPT SERVICE	Postage	
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	Return Receipt Fee	
	Restricted Delivery	
	Total Postage & Fees	

<p>US Postal Service</p> <p><b>Receipt for Certified Mail</b></p> <p><small>No Insurance Coverage Provided Do Not Use for International Mail</small></p>	<p>POSTMARK OR DATE</p> <p>11/27/06</p>
--	---

Exhibit B  
Postal Return Documents



7110 3901 2448 1137 8554

RETURN RECEIPT REQUESTED



049J82020258  
\$05.849  
11/17/2006  
Mailed From 95814  
US POSTAGE

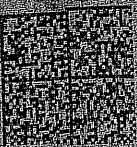
STATE OF CALIFORNIA  
DEPARTMENT OF JUSTICE  
OFFICE OF ATTORNEY GENERAL  
P.O. BOX 944255  
SACRAMENTO, CA 94244-2550

Roxana M. Johnson  
7916 Arcade Lake Lane  
Citrus Heights, CA 95621

JOHN916 955102165 IN 24 11/21/06  
UNABLE TO FORWARD

NO FORWARD ORDER ON FILE  
RETURN TO POSTMASTER  
OF ADDRESSEE FOR REVIEW

NOT RECORDED  
NO POSTAGE  
NECESSARY  
IF MAILED  
IN THE  
UNITED STATES



NOV 16 2006  
\$01.590  
11/17/2006  
95616  
US POSTAGE

STATE OF CALIFORNIA  
DEPARTMENT OF JUSTICE  
OFFICE OF ATTORNEY GENERAL

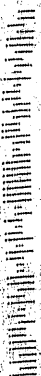
P.O. BOX 944255  
SACRAMENTO, CA 94244-2550

Roxana M. Johnson  
7916 Arcade Lake Lane  
Citrus Heights, CA 95621



NOT DELIVERABLE  
NO POSTAGE  
NECESSARY  
IF MAILED  
IN THE  
UNITED STATES

JOHN916 956102165 1N 24 11/21/06  
UNABLE TO FORWARD  
NO FORWARD ORDER ON FILE  
RETURN TO POSTMASTER  
OF ADDRESSEE FOR REVIEW



7540 3901 9846 9138 1275

RETURN RECEIPT REQUESTED



049J82020258

\$05.840

09/12/2006

Mailed From 95814

US POSTAGE

STATE OF CALIFORNIA  
DEPARTMENT OF JUSTICE  
OFFICE OF ATTORNEY GENERAL

P.O. BOX 944255  
SACRAMENTO, CA 94244-2550

Robert Johnson  
P.O. Box  
Citrus Heights

UNCLAIMED

UNCLAIMED

1st NOTICE 9-13  
2nd NOTICE 9-20  
RETURN DATE 9-28

9-13

Exhibit C  
Certification of Costs

# Cost-of-Suit Summary

As Of 11/13/2006  
Matter ID: SA2006101290  
Description JOHNSON, ROXANA M.

Total Legal Costs: \$1,788.00  
Cost-of-Suit: \$0.00  
Grand Total: \$1,788.00

Matter Time Activity Summary				Amount
Rate	Hrs Wkld			
Professional Type: Attorney				
FY: 2006-2007				
\$158.00	3.00			\$474.00
FY 2006-2007 Total:				\$474.00
FY: 2005-2006				
\$146.00	9.00			\$1,314.00
FY 2005-2006 Total:				\$1,314.00
Attorney Total:				\$1,788.00
Total Legal Costs:				\$1,788.00

Cost-of-Suit				
Entry #	Journal Date	Vendor #	Vendor	Amount
Client Agency:				
FY:				
Component Description:				
Total:				\$0.00
FY Total:				\$0.00
Client Agency Total:				\$0.00
Cost-of-Suit:				\$0.00

\* Denotes soft costs which are not included in totals.